

**HERITAGE - WTI, INC.**1250 St. George Street
East Liverpool, OH 43920

Telephone: (330) 385-7336

Fax: (330) 386-2167

TO: Susan ShewczykCOMPANY: Oregon DEQFAX: (503) 373-7944FROM: Carrie Beringe [EHS Manager]DATE: 2/16RE: Requested DocumentsPAGES: 14

(INCLUDING COVER SHEET)

PLEASE NOTIFY US IF YOU DO NOT RECEIVE ALL PAGES

CC: _____

COMMENTS: Jeff BrownDOT: roadside inspectionZR: drums

should have been
transportation

433 - dangerous when wet -

note: dust friction can cause exp.

A. Sealed & overpacked
no backing



Form Approved, OMB No. 2050-0039

Please print or type. (Form designed for use on eila (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number ORD050965848	2. Page 1 of 1	3. Emergency Response Phone (877) 818-0087	4. Manifest Tracking Number 000167371 VES	
5. Generator's Name and Mailing Address WAH CHANG - NORTH PO BOX 460 ATTN: RYAN BODILY ALBANY, OR 973210460		Generator's Site Address (if different than mailing address) WAH CHANG - NORTH PO BOX 460 1600 OLD SALEM ROAD NE ALBANY, OR 973210460		U.S. EPA ID Number K S 0 0 0 0 3 3 6 8 9 1		
6. Transporter 1 Company Name SAVANNAH TRANSPORT		7. Transporter 2 Company Name		U.S. EPA ID Number		
8. Designated Facility Name and Site Address HERITAGE-WTI, INC. 1250 SAINT GEORGE STREET EAST LIVERPOOL, OH 43920		Facility's Phone 330 385-7336		U.S. EPA ID Number O H D 9 8 0 6 1 3 5 4 1		
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit WL/Vol.
	X	UN3178, FLAMMABLE SOLID, INORGANIC, n.o.s., (ZIRCONIUM, HAFNIUM), 4.1, III	040	DM	43,180	P
	2.					
	3.					
	4.					
13. Waste Codes NONE						
14. Special Handling Instructions and Additional Information ER Service Contracted by VESTS + 1) ERG:133 W:434443 A:WT102796-1 Violator WTI						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name FRANK HAMILTON						
Signature <i>Frank Hamilton</i>						
Month Day Year 12/16/11						
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:			
	Transporter signature (for exports only):					
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials		Signature		Month Day Year	
	Transporter 1 Printed/Typed Name SAXON SCARLE		<i>Saxon Scarle</i>		12/16/11	
TRANSPORTER	Transporter 2 Printed/Typed Name		Signature		Month Day Year	
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number: U.S. EPA ID Number					
DESIGNATED FACILITY	18b. Alternate Facility (or Generator) Facility's Phone					
	18c. Signature of Alternate Facility (or Generator) Month Day Year					
DESIGNATED FACILITY	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 15a Printed/Typed Name <i>Frank Hamilton</i> Signature <i>Frank Hamilton</i> Month Day Year 12/12/11					

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)



Wastestream Survey

Wastestream 92796 - 1

GENERATOR INFORMATION

Name: WAH CHANG
Address (site): *1600 OLD SALEM ROAD NE ALBANY, OR 97321-0460 UNITED STATES
Address (mail): PAT MACAULEY P O BOX 460 ALBANY, OR 97321-0460 UNITED STATES
US EPA ID: ORD050955848 State ID:
Regulatory Status: LARGE QUANTITY
Technical Contact: FRANK HAMILTON Phone: (541)926-4211
Short Name: WCAO

WASTESTREAM INFORMATION - GENERAL

Common Name: NON FERROUS METAL FINES & METAL RESIDUE
Waste Class: 071 - WATER-REACTIVE, FLAMMABLE METAL POWDERS
Generating Process: MACHINE CONDITIONING
EPA Source Code: G05 - METAL FORMING AND TREATMENT (PICKLING, HEAT TRE...
EPA Form Code: W307 - METAL SCALE, FILINGS AND SCRAP (INCL METAL DRUMS)
Physical State @ 70F: SEMI-SOLID
Odor:
Color:
Density: LB/GAL
Estimated Annual Volume: 200000 LBS
Conditional Approval?: N

MANAGEMENT SYSTEM ASSIGNMENTS

TSD#	Product Code - Desc	Put Away Area	Process System - Desc	Cont Type
15119	8074 SOL MIX NON MYL DRUM	A GENERAL STORAGE	1251 FRONT WALL	DF, DM
15119	8073 SOL MIX METAL DRUM	A GENERAL STORAGE	1251 FRONT WALL	DF, DM

EPA HAZARD CODES

None specified

STATE HAZARD CODES

None Specified



Wastestream Survey

Wastestream 92796 - 1

SAFETY INFORMATION

<u>HMIS Information</u>	<u>Description</u>
HEALTH	1 - SLIGHT HAZARD
FLAMMABLE	2@ - MODERATE HAZARD-WATER REACTIVE
REACTIVE	2 - MODERATE HAZARD
PPE	F2 - DUST RESP-NEOPRENE
* = Carcinogen	
@ = Water Reactive	

COMMENTS

Type Text

IN on hold pending investigation

PE APRON PPE-F2

PI THIS MATERIAL NEEDS PACKAGED IN 400 LB CHARGES WETTED WITH OIL.

IN - INTERNAL

PE - PROTECTIVE EQUIPMENT

PI - PROCESS INSTRUCTION

TRANSPORTATION INFORMATION

Shipping Description: RQ, UN3178, FLAMMABLE SOLID, (INORGANIC, N.O.S., 4.1, PGIII, (HAFNIUM, ZIRCONIUM), ERG#133

Label Codes: 4.1 - FLAMMABLE SOLID

COMMENTS

Type Text

LM NO SAMPLE REQD

LM - LABEL MESSAGE

SURVEY RESPONSES

PHYSICAL AND CHEMICAL PROPERTIES.

<u>Question</u>	<u>Reply</u>	<u>Question</u>	<u>Reply</u>
Flash Point	140 to <200	Boiling Point	>100
BTU/LB, range, low value	3000	BTU/LB, range, high value	8000
PH, range, low value	3	PH, range, high value	12
Is the waste pumpable?	NO	Will heat improve the flow?	NO
Is this a dust hazard?	NO		

ADDITIONAL HAZARDS.

<u>Question</u>	<u>Reply</u>	<u>Question</u>	<u>Reply</u>
Air Reactive	NO	Asbestos	NO
Carcinogen	NO	Gas	NO
Dioxins, Furans, or pre-cursors	NO	Explosive	NO



Wastestream Survey

Wastestream 92796 - 1

ADDITIONAL HAZARDS.

<u>Question</u>	<u>Reply</u>	<u>Question</u>	<u>Reply</u>
Infectious Agents	NO	Lab Pack	NO
Oxidizer	NO	Pyrophoric	NO
Radioactive	NO	Shock Sensitive	NO
Water Reactive	YES		

ADDITIONAL REGULATORY INFORMATION.

<u>Question</u>	<u>Reply</u>	<u>Question</u>	<u>Reply</u>
PCBs ? (If Yes, specify range)	NO	Subject to Benzene NESHAP controls (40CFR61.340-358) ?	Not Applicable

WTI

<u>Question</u>	<u>Reply</u>	<u>Question</u>	<u>Reply</u>
Miscellaneous Special Waste	YES		



Wastestream Survey

Wastestream 92796 - 1

CHEMICAL CONSTITUENTS

Using specific chemical names, list all constituents present in the wastestream. Attach available analyses or Material Safety Data Sheets (MSDSs). Total composition must equal or exceed 100%.

TYPE - GENERATOR

<u>Constituents</u>		<u>Range</u>	<u>Result</u>	<u>Units</u>	<u>CAS#</u>	<u>EHS ID#</u>	<u>Date</u>
METAL RESIDUE/METAL FINES	CONTAINING:	94 - 99		PERCENT			11-JAN-01
CUTTING OIL		1 - 4		PERCENT			11-JAN-01
HAFNIUM		10 - 25		PERCENT	7440-58-6		11-JAN-01
NIOBIUM		10 - 25		PERCENT			11-JAN-01
TITANIUM		10 - 25		PERCENT	7440-32-6		11-JAN-01
WATER		0 - 2		PERCENT			11-JAN-01
ZIRCONIUM		45 - 65		PERCENT	7440-67-7		11-JAN-01

EHS - Extremely Hazardous Substance

CAS - Chemical Abstracts Service



Wastestream Survey

Wastestream 92796 - 1

CONSTITUENT RANGES

<u>Constituents</u>	<u>Range</u>	<u>Result</u>	<u>Units</u>	<u>CAS#</u>	<u>EHS? ID#</u>	<u>Date</u>
ASH %	- 50	50	PERCENT	NA		19-OCT-99
HEAT VALUE	- 8000	8000	BTU/LB	NA		19-OCT-99

EHS - Extremely Hazardous Substance

CAS - Chemical Abstracts Service

JAMS**Heritage-WTI, Inc.
Incident Report****2011.1539**

To be completed by the employee and supervisor
before the end of the shift.

I. Incident Information:

Date: 12/17/2011 **Time:** 13:00
Type: Fire/Explosion
Location: Container Processing Splitting Area

Investigator(s):

Winde Hamrick
Christine Shorokey
Carrie Beringer
Randy Sadler
Curt Moffett
Keith Moyer
Steve Olesky
Russ Henry
Jill Auteri

Investigators - Manager:**Investigators - Safety Technician:****Investigators - Employee:**

Russ Henry
Jim Brinker
Mike Nicholson
Steve Lorah
John Peterka

Investigators - Others:**Attachments:****II. Employee Information:**

Name: Tom Bailey
Department: BOP **Job Title:** Safety Service Technician
Supervisor (GM) on Duty: Russ Henry **Overtime:** Yes ☒ No

If other than VRA

Company Name: _____
Company Address: _____
Company Phone: _____ **Was Company Notified?:** Yes ☒ No

III. Incident Scene Information:

Specific Location: BOP, floor behind splitting platform/altar

PSM Location: ☒ Yes ☐ No

Describe How the Incident Occured:

While splitting profile 92796-1, a violent exothermic reaction initiated a fire that injured two employees. A responder received minor burns during rescue.

Type of Machinery/Equipment/Materials/Waste Involved:

Dalmac, Hand Tools

Waste Stream Profile: 92796-1

Container Number: _____

Machinery / Equipment Placed:

Repairs Required

Out of Service

JAMS Work Order Number(s):

Protecto Wire
Dalmao
Vapor Recovery Snorkle
Split Altar Computer
Web Styles
Safety Shower/Eye Wash
Fork Truck
Fire Suppression System
Lighting

IV. Events Causing the Incident:

Describe the events and conditions that contributed to the incident. Include information on the worker, machinery and equipment, environment and management.

Currently under investigation.

V. Corrective Actions:

Identify the factors listed above that can be corrected to prevent a reoccurrence of this type of accident. Indicate the person responsible for making the change and project a target date for completion of the task.

**** Initial - Corrective Actions:**

Stopped all waste processing and responded to the incident. Resumed limited operations Saturday evening.
Re-evaluated processing restrictions on Monday.

Delayed waste receipts Monday.

Transferring all drums of profile 92796-1 to a van for storage in 90 day north.

Caution taped incident area for limited access and further investigation.

24 hour monitoring of incident area and drums on splitting floor via camera in control room until fire suppression is repaired and automated.

Cancelled all activity on Wah Chang waste streams.

Removed drums in queuing lanes and staged them in the caution taped incident area.

Collected debris and other items that were most likely involved in the incident, bagged it, and set it under lock and key for evaluation at a later date.

**** Long Term - Corrective Actions:**

Yet to be determined.

CPAR Generated:

Yes

☐ No

Responsible Person:

Target Completion Date:

12:00:00 AM

Method of verification of Corrective Action.

Verification Date:

12:00:00 AM

V. Incident Report Prepared by:

Name: Keith Moyer

Title: Field Services Manager

Signature: Keith Moyer

Date: 12/19/2011 1:20:55 PM

VI. Summary:

Include comments that would promote a safe workplace environment and reduce an accidents potential in the future based on review of the events causing the incident and implementation of Corrective Actions.

As a result of a violent exothermic reaction and fire that occurred during the splitting of waste stream 92796-1, three employees were injured and one fatality has occurred as a result of those injuries. The plant has been damaged. Due to safety and other concerns processing has been restricted. An investigation is under way being performed by an internal team, external agencies, and other contracted experts. Counseling is being provided as requested.

Risk Rating: Very High

Category: _____

VII. Injury Information:

Name of Injured person: Tom Bailey, John Bechak

Nature of Injury: Burn

Body Part: Other

Work Start Time: 5:30:00 AM

Employee's Specific Task and Activity at Time of Injury:

Tom and John were splitting waste stream number 92796-1. 55 gallon steel drums were overpacked in 85 gallon steel drums under oil. Prior to removing the material from the 55s, Tom and John removed the oil using a plastic hand pump. The oil was placed into a lined fiber and solidified in fiber drums with hand tools and vermiculite. Then, the solid material was removed from the inner 55 gallon drum with hand tools and placed in lined fiber drums as well.

Injury Treatment (Click all that are applicable):☐ Fatality☐ Onsite First Aid☐ Offsite TreatmentELO Hospital, West Penn Burn Unit,
Pitt, PA

Other, Specify: _____

Drug and Alcohol Testing Done:

Yes

☐ No

N/A

Date and Time:

12:00:00 AM

For Safety Manager: _____

First Aid

Recordable

Restricted Duty

Loss Work Days

JAMSHeritage-WTI, Inc.
Incident Report

2011.1539



HERITAGE-WTI, INC.
1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

Mr. Scott Nally
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, OH 43216-1049

January 13, 2012
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: Unmanifested Waste Report - Rule 3745-54-76 of the Ohio Administrative Code
Heritage - WTI, Inc.
USEPA ID No.: OHD 980 613 541 / Ohio Permit no.: 02-15-0589

Dear Mr. Nally:

This letter is being submitted in accordance with rule 3745-54-76 of the Ohio Administrative Code. Rule 3745-54-76 of the Administrative Code requires a facility who accepts for treatment, storage, or disposal any hazardous waste from an off-site source without an accompanying manifest, or without an accompanying shipping paper as described in paragraph (E)(2) of rule 3745-53-20 of the Administrative Code, and if the waste is not excluded from the manifest requirement by rule 3745-51-05 of the Administrative Code to prepare and submit a single copy of an "Unmanifested Waste Report" to the director within fifteen days after receiving the waste. The specified information is given below.

1. *The EPA Identification number, name, and address of the facility*

USEPA I.D. No.: OHD 980 613 541
Heritage - WTI, Inc.
1250 Saint George Street
East Liverpool, OH 43920

2. *The date the facility received the waste*

The waste was received at Heritage - WTI, Inc. on December 13, 2011.

3. *The EPA identification number, name, and address of the generator and transporter, if available:*

Generator: USEPA I.D. No.: ORD 050 955 848
Wah Chang - North
1600 Old Salem Road NE
Albany, OR 97321-0460

Transporter #1: USEPA I.D. No.: KSO 000 336 891
Savannah Transport, Inc.
4425 NW Highway 24
Topeka, KS 66618

4. *A description and the quantity of each unmanifested hazardous waste and facility received:*

The material was received at the Heritage - WTI, Inc. (WTI) facility in East Liverpool, OH. The material was shipped as a Flammable Solid on a Uniform Hazardous Waste Manifest without any hazardous waste codes. Specifically, the D.O.T. description did not identify the materials involved as a hazardous waste nor was the shipment carrying hazardous waste codes. WTI received 40 containers on this shipment.

On December 17, 2011, WTI experienced an incident with this material. After the incident, the generator indicated that the material WTI received had a chemical composition of 100% zirconium instead of the 65% zirconium that was listed in the WTI waste stream information. Based on the information from the generator and the incident involving the material, WTI believes this material should carry hazardous waste codes D001 and D003. Specifically, we believe the containers involved in the incident contained waste material that was capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and when ignited, burned so vigorously and persistently as to create a hazard. Further, we believe that the containers involved in the incident contained materials that were readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure.

We currently are in the process of developing a protocol to safely sample and test the waste to determine whether the remaining containers possess the same physical properties and hazards as the containers involved in the incident.

5. *The method of treatment, storage, or disposal for each hazardous waste:*

The waste was and is being managed as a hazardous waste at WTI. WTI reserves the right to reject all or part of the remaining containers of this shipment, and will do so in accordance with OAC 3745-54-72(D). Prior to the incident, WTI had processed six (6) containers of this material. There were two (2) containers involved in the incident, and 32 containers that remain in storage. Until WTI can determine whether the material can be safely rejected to either the original generator or to an alternate facility, the material will remain in a secure location at the WTI facility.

6. *The certification signed by the owner or operator of the facility or his authorized representative; and*

The certification is provided below.

7. *A brief description of why the waste was unmanifested, if known:*

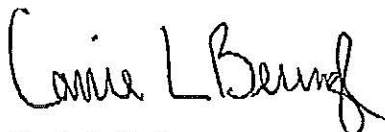
Unknown. WTI establishes a waste stream profile for its customers/generators based on wastestream information provided on standardized forms to our personnel. In this instance, the material was identified and shipped as non-hazardous by the generator. After the incident at WTI, the material is believed to be hazardous for D001 and D003.

Please note that the waste material in question was transported in a vehicle which has the appropriate licenses to transport hazardous waste, to a RCRA permitted incinerator, that all parties involved have EPA identification numbers, and the material was designated for and is being managed in hazardous treatment and storage systems at a RCRA-permitted facility.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

I trust that this information is adequate for your purpose. If there are any questions or comments regarding this matter, please contact me at 330.385.7336.

Sincerely,



Carrie L. Beringer
Environmental, Health, and Safety Manager
Heritage - WTI, Inc.

cc: Frank Popotnik - OBPA/DHWM/NEDO
Michelle Tarka - OBPA/DHWM/NEDO

ER HOT & HABANERO TOPICS
Items of special interest to DEQ EMT, Gov office, legislators, etc:

Date: 11/15/2011 Name: Lissa Druback

Topic: Fire at Envirotech Services Inc.

On Thursday, Nov. 10, 2011, a fire was reported at Envirotech Services, Inc. in Prineville and the Crook County Fire and Rescue responded to the incident. Envirotech Services makes deicing and dust suppression brines from waste magnesium chloride it receives from Allegheny Technologies, Inc.

The fire started when employees were cleaning up some of their waste materials from the process. This waste contains unoxidized zirconium metal, and the metal created some sparks when the cleaning tool struck the material. The sparks caught some grass on fire which subsequently caught a pallet on fire. The pallet had approximately 8 metal drums of this waste material on it. The drums got quite hot from the fire. DEQ was contacted by CCFR on Monday, Nov. 14, about the incident to better understand the nature of the waste material. Rich Duval, of the HW program, discussed the incident with the Fire Marshall and conducted a site visit on Nov. 15.

DEQ initially became involved in this site because it issued a variance to Allegheny Technologies and Envirotech Services that determined that ATI's waste magnesium chloride was not a hazardous waste when it is used in the Envirotech Services' process. DEQ decided to issue the variance because the waste is treated at ATI in a manner that makes the material similar to raw materials Envirotech had previously purchased from another source. This substance was not involved in the fire.

DEQ also reviewed analytical data and the results of a standard ignitability test on the waste material involved upon request by the Crook County Landfill last summer. DEQ determined that the material is not hazardous, will not ignite on its own without an exterior ignition source, and can be treated as a solid waste and be placed in a landfill. DEQ recommended that Envirotech stabilize the waste prior to disposing of the material so that it would not heat up in the landfill if exposed to an ignition source. Envirotech Services was attempting to do this by mixing the waste with concrete in the drums before disposing of it. However, the process they were using did not fully stabilize the waste.

As a result of the site visit, DEQ will be working with Envirotech Services to develop a better stabilization method for the waste and will recommend better housekeeping methods for their process. DEQ will also provide guidance on proper disposal of the material involved in the fire.

Lorah, Steve

From: Davis, Lorraine
Sent: Thursday, December 15, 2011 4:05 PM
To: Lorah, Steve
Subject: Wah Chang drums from 12/13/11 92796-1

CONFIDENTIAL

Steve,

I talked with Vince Brown and Eric Feist of Veolia. Vince is the rep that goes on site. He talked to Fred Hamilton at Wah Chang.

According to Vince:

- *usually ship in 30 gal drums
- *this load was shipped as 55's overpacked into 85's (manifest 000167371VES, 40 drums)
- *55's were not DOT shippable, which is why all of them were overpacked, and, could have some rain water contamination in the 55's
- *milky look to the oil in the drums is probably a water soluble oil
- *the particle size of this load was more finely divided than normal

When I talked to Eric:

- *generator tried to have this material recycled
- *this would be why it was in 55's, not 30's originally
- *drums sat at recycler for a long time before they decided they couldn't handle them
- *drums were in bad condition when they went back to Wah Chang and likely where they were contaminated with rain water (if they actually were)

Let me know if we have to send these back. Do we know how many have already been repackaged?

Lorraine Davis
Customer Coordinator II
Heritage-WTI, Inc.
East Liverpool, OH 43920
330-386-2137 direct / 800-403-4890 toll free
330-386-2167 fax

CONFIDENTIAL

MT Rcvd 4/2/2012